

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE: LESLEY WELLS
)	
-vs-)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO REVIEW
SAP AMERICA, INC., et al.)	DEPOSITION PURSUANT TO
)	FED.R.CIV.P. 30(e)
Defendants.)	

Plaintiff Hodell-Natco Industries, Inc., through undersigned counsel and pursuant to Fed.R.Civ.P. 30(e), requests an extension of thirty (30) days for the reading and submission of any errata sheet, if necessary, for the deposition of Helmuth Guembel taken in this action. The undersigned counsel has conferred with opposing counsel, who have indicated they have no objection to the requested extension.

In support of the requested extension, it is noted that Mr. Guembel is located overseas and frequently required to travel as part of his regular employment, and has not had the opportunity to fully review his deposition testimony. Due to the intervening holiday, plaintiff requests that Mr. Guembel be given a brief extension in which to review his deposition transcript and note any changes, if necessary.

No party will be prejudiced by the requested extension, and as noted above, all parties have noted they have no objection to this request. Accordingly, plaintiff requests that Mr. Guembel be given until January 21, 2013 in which to review his deposition transcript and submit any necessary changes pursuant to Fed.R.Civ.P. 30(e).

Respectfully submitted,

/s/ P. Wesley Lambert

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of December 2012, a copy of the foregoing was filed electronically. Parties may access the document through the Court's electronic filing system.

/s/ P. Wesley Lambert

P. WESLEY LAMBERT (0076961)